

# county of ventura

---

February 13, 2014

Christopher Calfee, Senior Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

*Sent via email to CEQA.Guidelines@ceres.ca.gov*

**SUBJECT:** Governor's Office of Planning and Research's (OPR's) "Preliminary Evaluation of Alternative Methods of Transportation Analysis"

Dear Mr. Calfee:

Thank you for the opportunity to comment on the OPR's December 13, 2013, notice regarding the "Preliminary Evaluation of Alternative Methods of Transportation Analysis" (collectively, "the Notice"). This letter sets forth the County of Ventura Resource Management Agency's and Public Works Agency's comments and responses to the Notice.

## **Ventura County Resource Management Agency, Planning Division's Comments**

The Planning Division appreciates and supports the State's efforts to curb greenhouse gas emissions and address the formidable environmental challenges associated with climate change. However, it is questionable as to whether changing the Level of Service (LOS) methodology for evaluating transportation impacts to a Vehicle Miles Traveled (VMT) approach will effectively reduce greenhouse gas emissions—at least with regard to jurisdictions that lack urbanized areas and opportunities for redevelopment or infill development. For example, certain types of development projects (e.g., surface mining operations that require truck trips to haul aggregate resources) rely on natural resources in outlying areas and involve relatively high amounts of VMTs that cannot be reduced or mitigated using the various VMT methodologies that OPR is considering. Furthermore, there typically are very few transit priority areas within county unincorporated jurisdictions.

As stated in the Notice, location is the "most important determinant of vehicle travel."<sup>1</sup> It is most likely the case that VMT will be reduced more effectively through policies and land use designations set forth in jurisdictions' general plans, rather than changes to

---

<sup>1</sup> Reid Ewing & Robert Cervero (2010) Travel and the Built Environment, Journal of the American Planning Association, 76:3, 265-294, DOI: 10.1080/01944361003766766.



the methodologies used in traffic analyses for projects that are subject to the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

With that said, we have the following specific comments with regard to the Notice:

1. Section IV of the document, titled "Problems with using LOS in CEQA" highlights a number of shortcomings with the use of LOS. However, most of those listed in this section are directed at the improper use of LOS and the technical shortcomings of the measure. We agree with the conclusion that LOS is very often misapplied and misused and we would welcome guidance from OPR that would address that problem.
2. Perhaps with the exception of the "multi-modal level of service" concept, all of the alternatives rely on similar if not the same mitigation measures as does the traditional LOS measure. It is unclear how changing from the LOS methodology to the use of a VMT methodology will necessarily result in mitigation measures that more effectively reduce greenhouse gas emissions.
3. Most of the alternative measures, in particular the fuel use and motor vehicle hours traveled alternatives, if they are to be calculated in any detail, will rely on the same traffic models that are used today in LOS analysis and are the basis of general plans.
4. The "multi-modal level of service" alternative requires a depth of analysis that is likely beyond the technical and financial ability of many local jurisdictions to implement.
5. There is potential in the concept of "transportation beneficial development" but it will require careful analysis and application given the wide variety of development types and densities within the state.
6. Parking analyses should be addressed as part of zoning codes rather than CEQA. Indeed, most, if not all, of the environmental impacts from parking (e.g., degradation in the water quality of surface water runoff) are addressed in other sections of environmental documents. Furthermore, most parking analyses set forth in CEQA documents rely on the parking requirements set forth in zoning codes. A separate analysis of parking impacts in environmental documents is unnecessary.

#### **Ventura County Public Works Agency, Transportation Department's Comments**

The Ventura County Public Works Agency, Transportation Department provided the following comments regarding the Notice:

1. The Notice appears to be theoretical rather than factual in nature and scope.

- a. The paper does not explain how the metrics would be measured or how the metrics would be used to evaluate transportation impacts in the CEQA process.
  - b. Many assumptions and correlations are made in the Notice between the new metrics and the stated goals or results of the new metrics.
  - c. Perhaps more study would be required to correlate the measured value of the metric to its meaning in relation to the stated goals of the legislation.
2. With regard to congestion and delay, the measurement of the new metrics may or may not address or solve existing problems with congestion and delay.
  - a. A separate process in CEQA may be required to address and mitigate traffic congestion and delay.
  - b. With regard to infill development, it would appear that as population density increases (due to infill development) there would be a corresponding increase in congestion and delay (or travel time).
  - c. Because bus transit systems share the roadway with vehicles, and pickup and drop-off users at specific places along the roadway, these modes of travel tend to take more time than vehicular travel. This is a form of delay that is a disincentive for the use of bus transit as an alternative mode of travel.
  - d. Policies must address how to reduce the number of vehicles on the roadway.
3. With regard to greenhouse gases, we have the following comments.
  - a. Greenhouse gas production may be generated at a greater rate by vehicles idling or traveling slowly down congested freeways and highways because road widening projects would be discouraged under the new rules. Faster moving vehicles may produce less greenhouse gases.
  - b. Greenhouse gas production could be reduced by encouraging and funding alternative modes of travel.
4. With regard to the proposed new metrics, we have the following comments.
  - a. With regard to VMT, the measure of VMT may not directly correlate to a specific quantity or volume of greenhouse gases or mitigation to traffic congestion.
    - i. The VMT measurement may not consider the type, make, model, or age of the vehicle.
    - ii. VMT does not indicate time traveled (or delay over the distance traveled).
    - iii. The per capita emissions of vehicle travel versus travel by mass transit

needs to be studied.

- b. With regard to automobile trips generated, this measurement is already used by many agencies to compute traffic impact mitigation fees for cumulative adverse traffic impacts.
  - c. With regard to multi-modal level of service, this appears to represent a way of comparing the various modes of travel by an “A” to “F” grading system.  
The relationships between the various grading systems and the conclusions to be drawn from the various grades would need to be established.
  - d. With regard to fuel use, the total consumption of fuel may or may not correlate to VMT or greenhouse production because the fuel consumption rate and greenhouse production rate would be dependent on the type, make, model, or age of the vehicle, whether a car, bus, or truck and how fast or slow traffic moves in a particular roadway.
  - e. With regard to motor vehicle hours traveled, this would appear to support infill development versus urban development (which would be further from population centers) and thus contribute to some of the problems discussed herein regarding congestion, delay, and greenhouse gas production cause by slow moving or idling vehicles, whether cars, buses, or trucks.
5. Our last comment is that we would support the simplification of the CEQA process for the evaluation of transportation and traffic impacts as environmental impacts/factors in the CEQA process. These new metrics may lead to additional layers of governmental “red tape” and may or may not lead to the stated goals of the new legislation (to reduce greenhouse gases, to encourage infill development, and to encourage alternative modes of travel). Separate processes or environmental variables may be required in CEQA to evaluate a project’s environmental impacts or ability to mitigate congestion and/or to provide incentives for alternative (non-greenhouse generating) modes of travel.

## **Conclusion**

The comments set forth above are solely the comments and opinions of the Ventura County Resource Management Agency, Planning Division, as well as the Ventura County Public Works Agency, Transportation Department—they do not necessarily reflect the opinions of other Ventura County agencies or elected officials. We would like to provide further input as the OPR develops the VMT methodologies. Please send any notices regarding opportunities to review and comment on the OPR’s proposed VMT methodologies to me at [daniel.kleemann@ventura.org](mailto:daniel.kleemann@ventura.org). If you have any questions about

the comments set forth in this letter, please contact me at [daniel.klemann@ventura.org](mailto:daniel.klemann@ventura.org) or (805) 654-3588.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Klemann", with a stylized, cursive script.

Dan Klemann, Manager  
Residential Permits Section

c:     Resource Management Agency – Chris Stephens  
       Resource Management Agency, Planning Division – Kim L. Prillhart  
       Public Works Agency, Transportation Department – Dave Fleisch, Ben Emami, and Gerald Weeks